

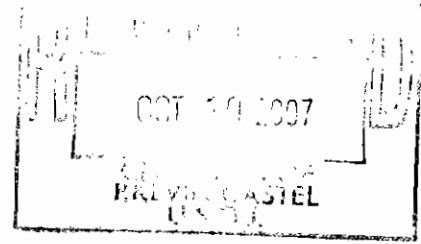
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MEMO ENDORSED

Honorable Judge Kevin P. Castel
United States District Judge, SDNY
500 Pearl Street
New York, New York 10007

October 17, 2007

Re: Christine Disla v. City of New York et al. 07 CV 4827 (KPC)

Your Honor –

With the consent of opposing counsel, plaintiff requests a 30 day extension of time to amend the complaint. The current deadline is November 9, 2007.

In August, defendants' counsel represented that it would take 45 days to produce the investigative file of the incident. In a letter to the court on September 5, defendants' counsel stated that the City is still in the process of marshalling documents relating to the case. On September 7, the court ordered that defendants turn over the investigative file by October 12, 2007 and respond to plaintiff's discovery demands.

On October 13, not having received the investigative file or responses to our discovery demands, we wrote defendants' counsel asking when they would be produced. When I called to follow up on October 16, defendants' counsel represented for the first time that the investigation was still pending, and that it would be completed in two to three weeks.

As we have represented to the court in the past, we need the investigative file to identify all of the officers involved in this incident. Defendants' counsel discloses numerous correction officials as witnesses, but fails to identify the subject matter about which they would testify. We therefore must ask for this additional time.

*Time to respond
to complaint by all
defendants is extended to
December 10, 2007.
SO ORDERED
JST
10-19-07*

We thank the court for its consideration.

Sincerely,

A handwritten signature in black ink, appearing to read 'Leo Glickman', with a stylized, cursive script.

Leo Glickman

CC: ACC Joyce Campbell-Priveterre
New York City Law Dept
100 Church Street, Fl. 4
New York, NY 10007